

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re **Tamara Paradissis**

Debtor(s)

Case No. **17-16197**
Chapter **7**

Motion to Avoid Judicial Lien on Personal Property

1. Debtor, Tamara Paradissis, commenced this case on September 12, 2017 by filing a voluntary petition for relief under Chapter 7 Title 11 of the United States Bankruptcy Code.
2. This court has jurisdiction over this motion, filed pursuant to 11 U.S.C. Sec. 522(f) to avoid and cancel a judicial lien held by Midland Funding LLC on property held by the debtor.
3. On October 13, 2016, creditors recorded a judicial lien against the following debtor's property:

All property of Debtor

The said judicial lien is entered of record as follows:

Bucks County Court of Common Pleas, 2016-06331, in the amount of \$1,736.07

4. All such possessions of debtor(s) have been claimed as fully exempt in their bankruptcy case.
5. The existence of Midland Funding LLC lien on debtor's household and personal goods impairs exemptions to which the debtor(s) would be entitled under 11 U.S.C. Sec. 522(b).

WHEREFORE, debtor(s) pray for an order against Midland Funding LLC avoiding and canceling the judicial lien in the above-mentioned property, and for such additional or alternative relief as may be just and proper.

Date January 5, 2018

Signature /s/ Tamara Paradissis
Tamara Paradissis
Debtor